



PETER S. CHRISTIANSEN, ESQ.

Nevada Bar No. 5254

pete@christiansenlaw.com

R. TODD TERRY, ESQ.

Nevada Bar No. 6519

tterry@christiansenlaw.com

WHITNEY J. BARRETT, ESQ.

Nevada Bar No. 13662

wbarrett@christiansenlaw.com

CHRISTIANSEN LAW OFFICES

810 South Casino Center Blvd., Suite 104

Las Vegas, Nevada 89101

Telephone: (702) 240-7979

Facsimile: (866) 412-6992

Attorneys for Plaintiff

DISTRICT COURT

CLARK COUNTY, NEVADA

ELIZABETH PIKE, an Individual;

Plaintiff,

vs.

CORE-MARK HOLDING COMPANY, a
Foreign Corporation, 39th & HILL
CONNECTION, LLC, a Foreign Limited-
Liability Company d/b/a 7-ELEVEN STORE
#34000; 26 RANCHO, LLC d/b/a 7-ELEVEN
STORE #34000; 26 HACIENDA, LLC d/b/a 7-
ELEVEN STORE #34000; DOES I through X,
inclusive; and ROE BUSINESS ENTITIES XI
through XX, inclusive,

Defendants.

CASE NO. A-19-796391-C
DEPT. NO. 16

**REQUEST FOR EXEMPTION FROM
ARBITRATION**

Plaintiff, ELIZABETH PIKE, by and through her attorneys, PETER S. CHRISTIANSEN, ESQ., R. TODD TERRY, ESQ. and KEELY A. PERDUE, ESQ. of CHRISTIANSEN LAW OFFICES, hereby requests that the above-entitled matter be exempted from arbitration pursuant to Nevada Rules Governing Alternative Dispute Resolution 3 and 5 because the action has a probable jury award value in excess of \$50,000.00.

This case arises from an incident that occurred on or about June 15, 2017. Plaintiff ELIZABETH PIKE, was a patron of Defendant 7-Eleven Store #34000. As Plaintiff was walking

CHRISTIANSEN LAW OFFICES
810 S. Casino Center Blvd., Suite 104
Las Vegas, Nevada 89101
702-240-7979 • Fax 866-412-6992

near the entrance of the Subject Store, she suddenly tripped and fell over a rolled-up mat that encroached into the walkway. As a result, Plaintiff fell to the ground, causing her to suffer serious and permanent bodily injuries, which required surgical intervention.

As a result of the injuries Plaintiff sustained, she incurred significant medical bills, endured pain and suffering and loss of life's pleasures. According to the records received to date, Plaintiff has incurred the following past medical damages:

	Medical Provider	Charges
1.	American Medical Response	\$ 2,042.20
2.	Southern Hills Hospital	\$ 93,884.05
3.	Fremont Emergency Services	\$ 1,360.00
4.	Radiology Specialists	\$ 1,966.00
5.	Henderson Hospital	\$201.00
6.	Shadow Emergency Physicians	TBD
7.	Desert Radiologists	TBD
8.	Desert Orthopedic Center	\$ 15,569.00
9.	Family Doctors of Green Valley	\$ 2,394.00
10.	Institute of Orthopedic Surgery	\$ 9,985.00
11.	Summit Anesthesia Consultants	\$ 1,341.00
12.	VitalCare	TBD
13.	Pueblo Medical Imaging	TBD
14.	West Coast Family Medical Clinic	TBD
15.	Sooke Evergreen Physiotherapy	TBD
	TOTAL	\$ 128,742.25

The above amounts ***do not*** include medical billings still to be obtained, nor do they include the costs of future medical expenses, damages for past and future pain and suffering, loss of enjoyment of life, loss of household services, or lost wages all of which exceed \$50,000.00.

Based upon Plaintiff's past medical damages, Plaintiff submits that the probable jury award value well exceeds \$50,000.00. Accordingly, Plaintiff requests that this matter be exempted from Court Annexed Arbitration.

///

///

CHRISTIANSEN LAW OFFICES
810 S. Casino Center Blvd., Suite 104
Las Vegas, Nevada 89101
702-240-7979 • Fax 866-412-6992

CERTIFICATION

I hereby certify pursuant to N.R.C.P. 11 this case to be within the exemption(s) stated above and am aware of the sanctions which may be imposed against any attorney or party who without good cause or justification attempts to remove a case from the arbitration program.

Dated this 13th day of August, 2019.

CHRISTIANSEN LAW OFFICES

By Whing Bat
PETER S. CHRISTIANSEN, ESQ.
R. TODD TERRY, ESQ.
WHITNEY J. BARRETT, ESQ.
Attorneys for Plaintiff

CHRISTIANSEN LAW OFFICES
810 S. Casino Center Blvd., Suite 104
Las Vegas, Nevada 89101
702-240-7979 • Fax 866-412-6992

CERTIFICATE OF SERVICE

Pursuant to NRCp 5(b), I certify that I am an employee of CHRISTIANSEN LAW OFFICES, and that on this 13th day of August, 2019 I caused the foregoing document entitled *Request for Exemption from Arbitration* to be served upon those persons designated by the parties in the E-Service Master List for the above-referenced matter in the Eighth Judicial District Court eFiling System in accordance with the mandatory electronic service requirements of Administrative Order 14-2 and the Nevada Electronic Filing and Conversion Rules.



An employee of Christiansen Law Offices